



U.S. Department of Justice

United States District Court
Southern District of New York

86 Chambers Street
New York, New York 10007

March 19, 2021

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VIA ECF

Hon. Analisa Torres
United States District Judge
United States District Court
500 Pearl Street
New York, New York 10007

Re: *Chen v. Wolf, et al.*, No. 20 Civ. 10420 (AT)

Dear Judge Torres:

This Office represents the government in this action in which the plaintiff seeks an order compelling U.S. Citizenship and Immigration Services (“USCIS”) to adjudicate his Application to Register Permanent Residence or to Adjust Status (Form I-485). I write to respectfully request that the government’s time to respond to the complaint be extended by approximately two months from April 1 to June 2, 2021, and that the initial conference now scheduled for April 12, 2021 be adjourned to the week of June 15, 2021 or thereafter.

The adjournment is respectfully requested because USCIS issued a Request for Evidence (“RFE”) on March 3, 2021, for which the response date is June 1, 2021 (plus an additional 60 days due to the pandemic). Plaintiff’s counsel has informed this Office, however, that a response to the RFE is expected to be submitted within approximately the next week. The adjournment is thus requested to provide time for the plaintiff to submit his RFE response, for USCIS to process it and then determine next steps, including potentially an adjudication of the Form I-485, which could render this action moot.


This is the first request to extend the government’s time to respond to the complaint and second request to adjourn the initial conference.¹ Plaintiff’s counsel consents to these requests.

I thank the Court for its consideration of this letter.

GRANTED. By **June 2, 2021**, the Government shall answer or otherwise respond to the Complaint. The conference scheduled for April 12, 2021, is ADJOURNED to **June 17, 2021**, at **10:00 a.m.** By **June 10, 2021**, the parties shall submit their joint letter and proposed case management plan.

SO ORDERED.

Dated: March 22, 2021
New York, New York



ANALISA TORRES
United States District Judge

¹ On February 5, 2021, the parties requested an adjournment of the initial conference scheduled for February 9, 2021, because the government had only recently been served and its response was not due until March 28. *See* ECF Nos. 10, 11. The Court granted the request. *See* ECF No. 12.